

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BOSTON EDISON COMPANY d/b/a NSTAR ELECTRIC

D.T.E. 03-117A

ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Boston Edison Company or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide three copies of each response.
16. The term "Company" refers to Boston Edison Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS

- AG-1-1 Please provide complete copies of the updated final (or settlement) transition charge schedules filed by the Company in each of the last five transition charge cases.
- AG-1-2 Please provide complete copies of all of the pages of Exhibits BEC-JFL-1 and BEC-JFL-2 with a complete history of the revenues and the costs for each of the years from the inception of the transition charge.
- AG-1-3 Referring to Exh. BEC-JFL, page 6, lines 12-16, please itemize each of the changes in methodology from last year's reconciliation filing, and provide a complete and detailed description of the reasons for each change in methodology.
- AG-1-4 Please provide a copy of the Company's 2003 FERC Form 1 and 2003 Annual Return to the Department.
- AG-1-5 Referring to Exh. BEC-JFL-2 (Supp), p. 2, please provide a complete copy of the property tax agreement with the Town of Plymouth, along with all revisions, amendments, and attachments, thereto.
- AG-1-6 Referring to Exh. BEC-JFL-2 (Supp), p. 2, please provide copies of all correspondence with the Town of Plymouth regarding the property tax agreement, since it was finalized.
- AG-1-7 Referring to Exh. BEC-JFL-2 (Supp), page 2, please provide copies of all correspondence with Entergy regarding the property tax agreement, since it was finalized.
- AG-1-8 Referring to Exh. BEC-JFL-2 (Supp), p. 2, please provide an accounting of all cash flows to and from the Company, the Town of Plymouth, and Entergy regarding the property tax agreement, since it was finalized.
- AG-1-9 Referring to Exh. BEC-JFL-2 (Supp), p. 3, please provide copies of the invoices/ correspondence that determined the NEIL credits indicated on line 1.
- AG-1-10 Referring to Exh. BEC-JFL-2 (Supp), p. 3, please provide copies of the invoices that determined the Maxey Flats Payment indicated on line 7.
- AG-1-11 Referring to Exh. BEC-JFL-2 (Supp), p. 6, please provide copies of the securitization account and trust fund financial statements for 2002 and 2003 indicating the sources of the balances that are used on page 6.

ATTORNEY GENERAL'S SECOND SET OF
DOCUMENT AND INFORMATION REQUESTS

- AG-2-1 Refer to Exhibits BEC-HCL-2 (rev.) through BEC-HCL-8 (rev), the compliance filing. Please explain how the changes to the Company's original filing made in the compliance filing are reflected in the supplemental filing.
- AG-2-2 Refer to Exh BEC-HCL, p. 7. Are there any rate classes, in addition to T-1, that have not been assessed their full transition charge adjustment? If yes, please identify and explain how and when these classes will be assessed the full amount of the adjustment. Explain how the net under/over recovery of the transition charges for these classes is reflected in the calculation of future transition charges, as shown in Exh. BEC-JFL-1.
- AG-2-3 Please provide a copy of all materials and documents filed by the Company at FERC in Docket No. FA03-43-000 (industry-wide audit of the accounting related to formula rate open access transmission tariffs). Include a discussion of the FERC audit proceedings and conferences to date. Please note that the August 14, 2003 FERC letter notifying the Company of its participation was addressed to Mr. Jeffrey Hershberg, Accountant.
- AG-2-4 Refer to Exh. BEC-JFL-3 (Supp.). Please provide a copy of all filings made at FERC during 2002 and 2003 related to the Company's transmission costs and rates. Include all supporting documents, calculations, workpapers and assumptions. Provide copies of all discovery requests and responses, testimony and briefs, as well as all related FERC orders.
- AG-2-5 Refer to Exh. BEC-JFL-3 (Supp.), p. 1. Please provide all documentation, workpapers, calculations and assumptions supporting each entry.
- AG-2-6 Refer to Exh. BEC-JFL -1 (Supp.), p. 4. Please provide all invoices and documentation supporting the data appearing in column C, "Actual Power Total Obligations" for the year 2003. Explain all changes from the original filing.
- AG-2-7 Refer to Exh. BEC-JFL-2 (Supp.), p. 5, line 3. Please provide the documentation supporting the "Demand Credit." Identify the wholesale customers and amounts for each customer that are included in the "Demand Credit."
- AG-2-8 Refer to Exh. BEC-JFL-4 (Supp.), p. 3. For each NUG, please provide the MW entitlement, the actual monthly entitlement received (kWh) during 2003, and the price per kWh for each month during 3. Include all supporting invoices, workpapers, calculations and assumptions related to the price per kWh.
- AG-2-9 Refer to Exh. BEC-JFL-4 (Supp.), p. 4. For each line item, please provide the

kWh purchased/sold by supplier/buyer, and the corresponding price per kWh for each month during 2003. Include all supporting invoices, workpapers calculations and assumptions related to the price per kWh. Regarding “Miscellaneous Transmission,” please explain and document these purchases/sales.

- AG-2-10 Refer to Exh. BEC-JFL-4 (Supp.). If the Company had entered into a Standard Offer procurement arrangements during 2003 where the providers of Standard Offer service effectively purchased all of the Company’s NUG entitlements and were responsible for providing, in return, 100% of the Company’s Standard Offer requirements (a back-to-back arrangement), provide an assessment of the performance under these arrangements. The assessment must include the comparison of costs under the back-to-back arrangement and the costs had the Company procured 100% of the requirements on a stand-alone basis. Include copies of all back-to-back arrangement contracts in effect during 2003. The contracts must include all pricing and delivery terms.
- AG-2-11 Refer to Exhs. BEC-HCL-3, p. 11A and HCL-3 (rev.), p. 11A. Please explain the basis for the change in the “billing quantities.” If HCL-3 (rev.) is incorrect, please provide a corrected page 11A and explain how any resulting rate and revenue corrections will be incorporated in future rates. Provide actual billing quantities for 2002 and 2003. Provide copies of the actual 2002, 2003 and 2004 tariffs.
- AG-2-12 Refer to Exh. BEC-JFL-5 (Supp.), p. 1, lines 18. Please provide the monthly kWh sales for each class.
- AG-2-13 Refer to Exh. BEC-JFL-5 (Supp.), p. 1, lines 8 and 9. Please provide the kWh purchased, by supplier, and the corresponding price per kWh for each month during 2003. Include all supporting invoices, workpapers, calculations and assumptions related to the price per kWh.
- AG-2-14 Does the Company receive any revenues related to FTRs, such as ARR revenues? If yes, please provide the dollar amount received during 2003 and explain how this amount was derived and how the Company’s customers have received the benefits of these revenues.
- AG-2-15 In addition to revenues associated with FTRs, does the Company receive any revenues from the sale of any product in the ISO-NE wholesale market? If yes, explain which products, provide the amount received during 2003, explain how this amount was derived and how the Company’s customers have received the benefits of these revenues.